

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

**SUPERSEDING INFORMATION**

-v.- :

FRANGESCO RUSSO, : S2 20 Cr. 306 (NGG)  
a/k/a "Frankie," :

Defendant.

- - - - - x

**COUNT ONE**  
**(Conspiracy to Commit Wire Fraud)**

The United States Attorney charges:

1. From at least in or about 2018 up to and including in or about 2020, in the Eastern District of New York and elsewhere, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that FRANGESCO RUSSO, a/k/a "Frankie," the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce,

writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, RUSSO and others conspired to devise and execute a scheme to defraud three lottery winners ("Lottery Victim-1," "Lottery Victim-2," and "Lottery Victim-3," collectively, the "Lottery Victims") and to obtain money and property from the Lottery Victims by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme, to transmit and cause to be transmitted wire transfers and wire communications in interstate and foreign commerce.

(Title 18, United States Code, Section 1349.)

**COUNT TWO**  
**(Wire Fraud)**

The United States Attorney further charges:

3. From at least in or about 2018 up to and including in or about 2020, in the Eastern District of New York and elsewhere, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings,

signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, RUSSO and others devised and executed a scheme to defraud the Lottery Victims and to obtain money and property from the Lottery Victims by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing such scheme, transmitted and caused to be transmitted wire transfers and wire communications in interstate and foreign commerce.

(Title 18, United States Code, Sections 1343 and 2.)

**COUNT THREE**  
**(Conspiracy to Engage in Unlawful Monetary Transactions)**

The United States Attorney further charges:

4. From at least in or about 2018 up to and including in or about 2020, in the Eastern District of New York and elsewhere, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to engage in monetary transactions in property derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

5. It was a part and an object of the conspiracy that FRANGESCO RUSSO, a/k/a "Frankie," the defendant, and others known and unknown, knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value

greater than \$10,000 that was derived from specified unlawful activity, to wit, the wire fraud offense charged in Count Two of this Information, in violation of Title 18, United States Code, Section 1957.

(Title 18, United States Code, Section 1956(h).)

**COUNT FOUR**  
**(Unlawful Monetary Transactions)**

The United States Attorney further charges:

6. From at least in or about 2018 up to and including in or about 2020, in the Eastern District of New York and elsewhere, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, knowingly engaged and attempted to engage in monetary transactions in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, to wit, the wire fraud offense charged in Count Two of this Information.

(Title 18, United States Code, Sections 1957 and 2.)

**COUNT FIVE**  
**(Conspiracy to Commit Extortionate Extension of Credit)**

7. From at least in or about March 2020 up to and including at least in or about May 2020, in the Eastern District of New York and elsewhere, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to make extortionate extensions of credit, as that term is

defined in Title 18, United States Code, Section 891(6), to wit, RUSSO and others extended one or more loans to an individual ("John Doe-1") with the understanding that delay in making repayment or failure to make repayment by John Doe-1 could result in threats of force.

(Title 18, United States Code, Section 892.)

**COUNT SIX**  
**(Extortionate Extension of Credit)**

8. From at least in or about March 2020 up to and including at least in or about May 2020, in the Eastern District of New York and elsewhere, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, knowingly made extortionate extensions of credit, as that term is defined in Title 18, United States Code, Section 891(6), and aided and abetted the same, to wit, RUSSO and others extended one or more loans to John Doe-1 with the understanding that delay in making repayment or failure to make repayment by John Doe-1 could result in threats of force.

(Title 18, United States Code, Sections 892 and 2.)

**COUNT SEVEN**  
**(Conspiracy to Commit Extortionate Collection of Credit)**

9. From at least in or about March 2020 up to and including at least in or about May 2020, in the Eastern District of New York and elsewhere, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other

to use extortionate means to collect and attempt to collect extensions of credit, as that term is defined in Title 18, United States Code, Section 891(5), and to punish persons for the nonrepayment of such extensions of credit, to wit, RUSSO and others extended one or more loans to John Doe-1, and used threats of force to collect and attempt to collect payment from John Doe-1, and to punish John Doe-1 for the nonrepayment thereof.

(Title 18, United States Code, Section 894.)

**COUNT EIGHT**  
**(Extortionate Collection of Credit)**

10. From at least in or about March 2020 up to and including at least in or about May 2020, in the Eastern District of New York and elsewhere, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, knowingly used extortionate means to collect and attempt to collect extensions of credit, as that term is defined in Title 18, United States Code, Section 891(5), and to punish persons for the nonrepayment of such extensions of credit, and aided and abetted the same, to wit, RUSSO and others extended one or more loans to John Doe-1, and used threats of force to collect and attempt to collect payment from John Doe-1, and to punish John Doe-1 for the nonrepayment thereof.

(Title 18, United States Code, Sections 894 and 2.)

**FORFEITURE ALLEGATIONS**

11. As a result of committing the offenses alleged in Counts One, Two, and Five through Eight of this Information, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

12. As a result of committing the offenses alleged in Counts Three and Four of this Information, FRANGESCO RUSSO, a/k/a "Frankie," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offenses, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses.

**Substitute Assets Provisions**

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of the any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981 and 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)



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DAMIAN WILLIAMS  
United States Attorney



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EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

FRANCESCO RUSSO,  
a/k/a "Frankie,"

Defendant.

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SUPERSEDING INFORMATION

S2 20 Cr. 306 (NGG)

(18 U.S.C. §§ 892, 894, 1343, 1349,  
1956(h), 1957, and 2.)

DAMIAN WILLIAMS

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United States Attorney.

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